

**LARUSSO & CONWAY, LLP
ATTORNEYS AT LAW
300 OLD COUNTRY ROAD
SUITE 341
MINEOLA, NEW YORK 11501**
Telephone No. (516) 248-3520
Facsimile No. (516) 248-3522

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April 5, 2011

Honorable Joseph F. Bianco
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Kamal Abdallah
Criminal Docket No. 09 CR 717(S-1) (JFB)

Dear Judge Bianco:

Please accept this letter requesting additional time (1) to file our post-trial Rule 29 and 33 motions and (2) to respond to the government's March 16, 2011 submission seeking a Preliminary Order of Forfeiture in the amount of \$300,000. Because of the difficulty in securing funds to pay for the remainder of the trial transcripts, not yet purchased, we respectfully seek the Court's permission to file our answer to the government's forfeiture application and to submit our post-trial motions by May 2, 2011.

As noted in our April 5, 2011 request for additional time to respond to the forfeiture application, my client Kamal Abdallah ("Abdallah") has been trying to secure the necessary funds to order the remaining portions of the trial transcript. Today, we filed an application to exonerate the \$7500 cash bail, posted for Mr. Abdallah's release in Texas. Hopefully, we can secure the funds within the next week, order the transcripts and make our submissions by the requested adjourned date, May 2, 2011.

Additionally, I have spoken with one of the trial attorneys, David Woll, who has no objection to our request, and left a message regarding our need for additional time for Tanya Hill, the Assistant U.S. Attorney handling the forfeiture matter.

Based upon the above, we respectfully request that the Court grant our request for additional time to submit our response to the government's forfeiture application and our post-trial motions until May 5, 2011.

Thank you very much for your consideration of our application.

Respectfully submitted,



Robert P. LaRusso
Attorney for Kamal Abdallah

cc: Scott B. Klugman, Esq.
Tanya Y. Hill, Esq.
Assistant U.S. Attorneys
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201
(via ecf)